

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**DR. SAM LEBARRE HORTON, on behalf of)
himself and all other entities and)
persons similarly situated,)
)
Plaintiff,) Case No. 4:17-cv-00266-CVE-JFJ
) JURY DEMAND
vs.)
)
MOLINA HEALTHCARE, INC.,)
)
Defendant.)**

**REPRESENTATIVE PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

COMES NOW Plaintiff Dr. Sam Lebarre Horton (“Representative Plaintiff”), individually and on behalf of the certified Class by and through Class Counsel, hereby submits his Motion for Final Approval of Class Action Settlement (“Motion for Final Approval”). For the reasons explained therein, the Representative Plaintiff respectfully requests that the Court: (1) grant final approval of the Settlement as fair, reasonable, and adequate, and in the best interest of all Class Members; (2) determine that notice was provided to Class Members in conformity with the Court’s Preliminary Approval Order, Rule 23(c)(2)(B), and due process, and (3) enter the Final Approval Order and Judgment attached hereto as **Exhibit A**.

The Motion is supported by the following materials filed contemporaneously herewith: (1) a Memorandum of Law; and (2) the Declaration of Edward Dattilo on behalf of Settlement Administrator KCC Regarding Notice. The Representative Plaintiff has conferred with counsel for the Defendant Molina Healthcare, Inc. (“Molina”), which does not oppose this motion. Plaintiff therefore respectfully requests that the Court enter the Final Approval Order and Judgment attached hereto as **Exhibit A**.

DATED: August 14, 2019

Respectfully Submitted,

/s/ Joe P. Leniski, Jr.

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*Attorneys for Representative Plaintiff and Class
Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on the August 14, 2019, I electronically filed the foregoing document via the court's online CM/ECF system, which subsequently transmitted notice to the following counsel of record via email:

JASON ALAN MCVICKER
MARY QUINN-COOPER
MICHAEL FRANKLIN SMITH
KATHLEEN R. HARTNETT
QUYEN TA

/s/ *Joe P. Leniski, Jr.*
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